FIFRA-FY2017-OCE-R2004

8400 River Road North Bergen, NJ 07047 1-800-338-0212 www.ecoraiderusa.com

Basis for Referral

Reneotech, Inc., under the name "EcoRaider," manufactures and offers for sale a line of products including the "Mosquito Killer and Repellant 3-in-1" via their website. The product appears to be offered for sale in a single size, 16 fluid ounce spray-bottle. According to the company website and product literature (PDF with highlights attached), the ingredients are:

- "Lemongrass oil"
- "Natural geraniol"
- "Other GRAS inert ingredients"

The website further states, "EcoRaider is a minimum risk pest control product and exempted for EPA registration." Upon review, the product fails to meet the conditions which would exempt it from regulation under FIFRA as a 25(b) minimum risk pesticide:

- •Condition 2 (Inert Ingredients): It is unclear if the inert ingredients in this product satisfy the list of 'approved inerts.' The product does not define the inert ingredients, instead listing them as "GRAS inert ingredients." Further clarification is needed to determine if these inerts qualify.
- Condition 3 (Ingredients List): Active ingredients do not list percentage by weight; inactive ingredients are not listed.
- Condition 4 (Health-Related Claims): Product marketing and materials make numerous public health claims, including:
- o "Protection against Zika bearing mosquitoes"
- o "Effectively repels...yellow fever mosquito"
- o "Natural & non-toxic: child, pet, bird and fish friendly"
- o "...against Asian tiger mosquito & yellow fever mosquito that spreads zika, malaria, dengue, West Nile, virus, chikungunya and yellowfever"
- o "Non-toxic aqueous bio-insecticide"
- Condition 6 (Label Statements): Product marketing and materials make claims including:
- o "Kills 100% of mosquitoes on contact"
- o "Kills 100% of mosquito larvae..."
- "Kills 100% adult mosquitoes by contact instantly"
- o "It not only effectively kills 100% of existing larvae, but also keep two weeks effectiveness in killing new larvae"

Tip and Complaint Details

This tip was submitted originally by the Maryland Department of Agriculture. Maryland Department of Agriculture indicates they intend to issue a state SSURO, however, due to the public health related

nature of this, PTEB is referring to Region 2, as the company is headquartered in North Bergen, New Jersey.